



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
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August 14, 2001

Mike Todd
Plant Manager
Prime Tanning Co., Inc.
216 Airport Drive
P.O. Box 5050
Rochester, New Hampshire 03866

CERTIFIED MAIL (7099 3400 0002 9772 5952)
RETURN RECEIPT REQUESTED

LETTER OF DEFICIENCY
ARD No. 2001-008

Dear Mr. Todd

On July 20, 2000, the New Hampshire Department of Environmental Services, Air Resources Division (DES) performed a compliance inspection of the Prime Tanning Co., Inc. facility located at 216 Airport Drive, Rochester (Prime Tanning). In addition to the on-site inspection, DES conducted a subsequent file review of DES records. The purpose of the inspection and file review was to evaluate compliance with Title V Operating Permit TV-OP-012 (the Permit) issued on March 9, 1999, and the NH Admin. Rules Env-A 100-3600, NH Rules Governing The Control of Air Pollution.

As a result of the inspection and file review, this Letter of Deficiency (LOD) is being sent to identify the following deficiencies:

1. Item 9 of Table 8, Condition VIII.F Reporting Requirements of the Permit, requires Prime Tanning to submit to DES an annual compliance certification no later than April 15 for the previous calendar year. This compliance certification must contain the information specified in Condition XXI of the Permit and document the compliance status of the facility for the previous calendar year. The annual compliance certification for calendar year 2000 was required to be submitted to DES by April 15, 2001. DES did not receive the annual compliance certification for calendar year 2000 until May 21, 2001;
2. Item 6 of Table 8, Condition VIII.F Reporting Requirements of the Permit, requires Prime Tanning to submit to DES every 6 months a summary report of monitoring and testing requirements and all instances of deviations from any permit requirement. DES has not received the report for the period of July through December of 2000 that Prime Tanning was required to submit by January 31, 2001. In addition, DES has not received the report for the period of January through July of 2001 that Prime Tanning was required to submit by July 31, 2001;
3. Item 1 of Table 5, Condition VIII.B Federally Enforceable Operational and Emission Limitations of the Permit, requires Prime Tanning to maintain records of the occurrence and duration of any startup, shutdown or malfunction in the operation of the Cleaver Brooks Boilers #1 and #2. At the time of the compliance inspection, Prime Tanning had not maintained records of boiler startup and shutdown;

4. Item 2 of Table 6, Condition VIII.D Monitoring/Testing Requirements of the Permit, requires Prime Tanning to annually inspect and maintain the Cleaver Brooks Boilers #1 and #2 and to test each boiler for efficient operation. Prime Tanning is required to maintain records of inspections, maintenance and efficiency testing. At the time of the compliance inspection, Prime Tanning did not have any records of boiler maintenance;
5. Item 6 of Table 6, Condition VIII.D Monitoring/Testing Requirements of the Permit, requires Prime Tanning to perform monthly inspection and repairs of the pressure sensors and water level controls for the water curtain overspray collection systems in each of the whole hide and side spray booths, and maintain records of these activities. At the time of the compliance inspection, Prime Tanning did not have any records of monthly inspections and repairs, and therefore, is not in compliance with Condition VIII.D of the Permit;
6. Item 1 of Table 7, Condition VIII.E Recordkeeping Requirements of the Permit, requires Prime Tanning to retain records of all required monitoring data, recordkeeping and reporting requirements and support information for a period of at least 5 years from origination. At the time of the compliance inspection, Prime Tanning did not retain records of reports it had submitted to DES;
7. Item 2 of Table 7, Condition VIII.E Recordkeeping Requirements of the Permit, requires Prime Tanning to maintain records of monitoring and testing required in Table 6 of the Permit. These records include preventative maintenance and inspections of stacks and fuel-burning devices, periodic monitoring of the boilers, fuel sulfur content and opacity measurements. At the time of the compliance inspection, Prime Tanning did not maintain these records;
8. Item 3 of Table 7, Condition VIII.E Recordkeeping Requirements of the Permit, requires Prime Tanning to maintain records of daily, monthly and annual natural gas usage at the facility. At the time of the compliance inspection, Prime Tanning did maintain records of monthly and annual natural gas usage, but not records of daily usage;
9. Item 4 of Table 7, Condition VIII.E Recordkeeping Requirements of the Permit, requires Prime Tanning to maintain records daily, monthly and annually of the distribution of natural gas utilization among the insignificant activities. At the time of the compliance inspection, Prime Tanning did not maintain these records;
10. Item 5 of Table 7, Condition VIII.E Recordkeeping Requirements of the Permit, requires Prime Tanning to maintain monthly records of the total quantities of the raw materials used, including hide throughput and coating chemicals used for each permitted device. The number of hours of operation for each permitted device shall be tracked on a daily, weekly, monthly, and annual basis. At the time of the compliance inspection, Prime Tanning did not maintain monthly records of hide throughput or daily records of hours of operation for each device;

11. Item 6 of Table 7, Condition VIII.E Recordkeeping Requirements of the Permit, requires Prime Tanning to maintain daily, weekly, monthly and annual records of the operating schedule and amount of fuel burned for each fuel-burning device for normal operation and ozone season operation. At the time of the compliance inspection, Prime Tanning did not maintain these records for NOx recordkeeping on a daily, weekly, monthly or annual basis;
12. Item 7 of Table 7, Condition VIII.E Recordkeeping Requirements of the Permit, requires Prime Tanning to maintain, for each permitted device, daily, weekly, monthly and annual records of operating schedules, type and formulation data for all VOC-containing coatings, and coating and solvent throughput data for normal operation and ozone season operation. At the time of the compliance inspection, Prime Tanning did not maintain daily records of operating schedules for normal and ozone seasons;
13. Item 8 of Table 7, Condition VIII.E Recordkeeping Requirements of the Permit, requires Prime Tanning to maintain annual records of actual emissions for each insignificant activity. At the time of the compliance inspection, Prime Tanning did not maintain records of these emissions;
14. Items 1, 2, 3 and 4 of Table 8, Condition VIII.F Reporting Requirements of the Permit, require Prime Tanning to submit a VOC emissions report, a NOx emissions report, a fuel usage report, and a process data report, respectively. These reports are required to be submitted to DES annually, no later than April 15 of the following year. Prime Tanning did not submit the reports for calendar year 2000 until May 15, 2001;
15. Item 1 of Table 8, Condition VIII.F Reporting Requirements of the Permit, requires Prime Tanning to submit annually a VOC emissions report for each device and for the entire facility, operating schedules for each device for a normal operating day and for a typical high ozone season day, and typical high ozone day VOC emissions. In the 1999 and 2000 VOC emissions reports, Prime Tanning did not report the VOC emissions for each device;
16. Item 2 of Table 8, Condition VIII.F Reporting Requirements of the Permit, requires Prime Tanning to submit annually a NOx emissions report for each fuel-burning device and for the entire facility, and operating schedules for each device for a normal operating day and for a typical high ozone season day. In the 1999 and 2000 NOx emissions reports, Prime Tanning did not report the operating schedule data or the NOx emissions for each fuel-burning device;
17. Item 3 of Table 8, Condition VIII.F Reporting Requirements of the Permit, requires Prime Tanning to report annually the actual monthly fuel usage for each permitted and insignificant device. In the 1999 and 2000 fuel usage reports, Prime Tanning did not report the fuel usage by device, or for the insignificant devices;
18. Item 4 of Table 8, Condition VIII.F Reporting Requirements of the Permit, requires Prime Tanning to report annually the coating and solvent throughput data for each device. In the 1999 and 2000 reports, Prime Tanning did not report daily and annual VOC usage for each device. Therefore, Prime Tanning is not in compliance with Condition VIII.F of the Permit

19. Items 4, 5, 6, and 9 of Table 4, Condition VIII.A State-Only Enforceable Operational and Emission Limitations and New Hampshire Administrative Rules, Env-A 1404.01(b) require Prime Tanning to demonstrate compliance with Env-A 1400 by May 8, 2000, following one of the methods specified in Env-A 1404.01(c). Further, Env-A 1400 requires this information be retained on site and made available to DES upon inspection. At the time of the compliance inspection, Prime Tanning had not completed the compliance demonstration as required by Env-A 1404.01(b); and

20. Condition XVII of the Permit and Env-A 612.04 require the owner or operator to submit a written request to DES for a minor permit modification prior to implementing a minor permit modification. The Permit listed a 30 kW, 0.395 MMBTU/hr, natural gas-fired emergency electrical generator as an insignificant device located at Prime Tanning. During the inspection on July 20, 2000, DES found that the emergency generator listed in the Permit had not been installed. Instead, DES found a 1.02 MMBTU/hr, natural gas-fired emergency electrical generator at Prime Tanning. Prime Tanning failed to submit a written request to DES for a minor permit modification prior to installing a different emergency generator than that listed in Prime Tanning's Title V permit application.

DES believes that the above-noted deficiencies can be resolved by Prime Tanning taking the following actions:

21. Submit all future Title V compliance certifications to DES by April 15 for the previous calendar year. As required by Condition XXI of the Permit, the compliance certification should state whether Prime Tanning is in or out of compliance with each term and condition of the Permit, whether compliance was continuous or intermittent during the reporting period, the methods used for determining compliance (including a description of the monitoring, record keeping, and reporting requirements and test methods), and any additional information required by DES to determine the compliance status of the source;

22. Within 15 days of receipt of this LOD, submit to DES summary reports of the monitoring and testing requirements for the periods of July through December of 2000 and January through July of 2001. In the report, include all instances of deviations from any permit requirement and the data required by Item 6 of Table 8, Condition VIII.F of the Permit;

23. Upon receipt of this LOD, begin maintaining the records required by Tables 5, 6 and 7 of the Permit. The specific deficiencies in recordkeeping discovered during the inspection and subsequent file review are noted in items 3 through 13 of this LOD;

24. Submit all future annual reports to DES by April 15 of the following year. Items 1, 2, 3 and 4 of Table 8, Condition VIII.F of the Permit, require Prime Tanning to submit to DES a VOC emissions report, a NOx emissions report, a fuel usage report, and a process data report. The reports for calendar year 2001 are required to be submitted to DES by April 15, 2002;

25. Within 30 days receipt of this LOD, submit to DES the results of the compliance determination required by Items 4, 5, 6, and 9 of Table 3, Condition VIII.A of the Permit and by Env-A 1400. This compliance determination was required to have been completed prior to May 8, 2000 following one of the methods specified in Env-A 1404.01(c). If the compliance determination shows that Prime Tanning is exceeding any of the ambient air limits of Env-A 1400, then submit to DES, with the results of the compliance determination, a compliance plan identifying how and when Prime Tanning will comply with Env-A 1400. An application for an amendment to the Permit should also be submitted to DES incorporating the changes required by the compliance plan to ensure Prime Tanning remains in compliance with the ambient air limits; and

26. Prior to making future modifications to any significant or insignificant activity identified in the Permit, submit a written request to DES for a modification of the Permit. Requests should be in accordance with Conditions XVII and XVIII of the Permit and Env-A 612.

In the event compliance is not achieved within the time periods indicated, DES may initiate formal action against Prime Tanning including issuing an order requiring the deficiencies to be corrected, and/or referring this matter to the NH Department of Justice for imposition of civil and/or criminal penalties. DES reserves the right to pursue administrative fines for the violations noted above.

Please address all information to Raymond Walters, at the following address:

NHDES Air Resources Division
Compliance Bureau
6 Hazen Drive
P.O. Box 95
Concord, NH 03302-0095

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental goals. DES strives to ensure that pollution prevention options are considered first, followed by recycling, treatment and disposal. DES is requesting that Stephanie D'Agostino, the Pollution Prevention Coordinator at the Department of Environmental Services, contact Prime Tanning to discuss possibilities for waste minimization or source reduction at the Prime Tanning facility. In the meantime, if Prime Tanning has any immediate questions about pollution prevention, please feel free to contact her at (603) 271-6398.

Please be advised that DES will continue to monitor Prime Tanning's compliance status and that this letter does not provide relief against any other existing or future violations. It is important that Prime Tanning be aware of all the requirements stipulated in its Permit. Please feel free to contact DES should you have any questions regarding compliance with the NH Code of Administrative Rules Env-A 100-3600 and the requirements of the Permit. A current copy of the Air Resources Division rules can be obtained from the DES website at www.des.state.nh.us/ard/ardrules.htm, or by contacting the Public Information Center at (603) 271-2975. If you have any questions regarding this matter, or require further information please contact Raymond Walters at (603) 271-6288 or Mary Ruel at (603) 271-6795.

Sincerely,



Pamela G. Monroe
Administrator, Compliance Bureau
Air Resources Division

PGM/raw

cc: E. Snyder, Prime Tanning, Environmental Health and Safety Director
K. A. Colburn, Director, NHDES-ARD
G. Rule, NHDES-O/C
S. D'Agostino, NHDES Pollution Prevention Coordinator
T. McCusker, EPA Region I
G. Stenhouse, City Manger, City of Rochester
Enforcement File

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